

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**THE HONORABLE RICK PERRY,**

**Plaintiff,**

**THE HONORABLE NEWT GINGRICH, THE  
HONORABLE JON HUNTSMAN, JR.,  
and THE HONORABLE RICK SANTORUM,**

**Intervenor-Plaintiffs,**

**Civil No. 3:11-CV-856**

**vs.**

**CHARLES JUDD, KIMBERLY  
BOWERS, and DON PALMER, members  
of the Virginia State Board of Elections, in  
their official capacities, and PAT MULLINS,  
in his official capacity as Chairman of the  
Republican Party of Virginia,**

**Defendants.**

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**AFFIDAVIT OF RACHEL P. ROBINSON**

The undersigned, Rachel P. Robinson, having been duly sworn, hereby deposes and says:

1. My name is Rachel P. Robinson. I have direct personal knowledge of the facts set forth herein and know them to be true and correct.
2. Speaker Newt Gingrich declared himself to be a candidate for the Office of President of the United States on May 11, 2011.
3. On May 16, 2011, Newt Gingrich filed his Statement of Candidacy with the Federal Election Commission.

4. During all relevant time periods in November and December of 2011, I assumed primary responsibility on behalf of Newt 2012, Inc. for seeking to ensure that Speaker Newt Gingrich collected the requisite signatures statewide and in each Congressional District and otherwise met the statutory requirements for inclusion on the Virginia Republican Party primary ballot for President of the United States.

5. In undertaking my responsibilities, I coordinated the efforts of volunteer residents from the Commonwealth of Virginia as well as the services of paid circulators and signature gatherers.

6. On December 22, 2011, I was advised, and believed, that Newt 2012 had collected the signatures of approximately 11,050 registered voters who reside in the Commonwealth of Virginia as well as over 400 signatures from each Virginia Congressional District.

7. On December 22, 2011, Newt Gingrich signed and affirmed, in the presence of a notary, his Declaration of Candidacy for the Commonwealth of Virginia.

8. On December 22, 2011, I ensured that Newt Gingrich submitted to the Board 11,050 petition signatures of purportedly eligible Virginia voters, of which less than 10,000 were ultimately verified as registered voters on the Board's registration rolls.

9. On December 23, 2011, Defendant Mullins made a preliminary determination and publically announced that Newt Gingrich had not submitted enough petition signatures, as required by Defendant Mullins, and would not be certified for the placement of his name on the presidential primary ballot.

10. Virginia's requirement for petition circulators to be either eligible or registered qualified voters in the state imposed a severe burden on my ability to obtain the requisite

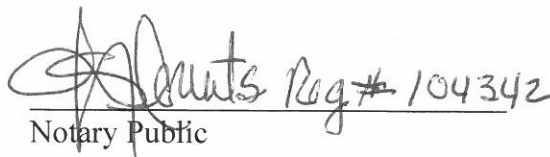
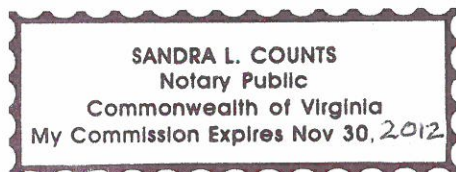
signatures Newt Gingrich required by substantially limiting the number of eligible petition circulators his campaign could enlist as volunteers or employ.

11. Virginia's requirement for petition circulators to be either eligible or registered qualified voters in the state prohibited Newt Gingrich from recruiting petition circulators who live outside the Commonwealth of Virginia to circulate petitions on his behalf.



Rachel P. Robinson  
Newt 2012  
Ballot Access Coordinator

Subscribed and sworn to before me this 6th day of January, 2012.



Notary Public